ABOUT THIS BUSINESS' FINANCES

6. Approximately, what were the gross revenues for this business during the following years? (Please estimate what you expect gross revenues will be for 1994.)

1992 gross revenues	$_____
1993 gross revenues	$_____
1994 gross revenues	$_____

7. Were revenues higher, lower, or the same in 1993 as in 1992?

	(Circle one)
Higher	01
Lower	02
Same	03

8. What do you believe to be the primary reason for the change in revenue between 1992 and 1993 you indicated above?

_____
_____
_____
_____

9. Do you expect revenues will be higher, lower, or the same in 1994 as in 1993?

	(Circle one)
Higher	01
Lower	02
Same	03

10. What do you believe to be the primary reason for the expected change in revenue between 1993 and 1994 you indicated above?

_____
_____
_____
_____

11. Please indicate what you believe the impact of the following factors were on your revenues in 1993:

	(Circle One for each factor)				
	Significant Decrease	Minor Decrease	No Impact	Minor Increase	Significant Increase
Prices/availability of goods/services you sell	01	02	03	04	05
Prices/availability of goods/services you buy	01	02	03	04	05
Statewide recession	01	02	03	04	05
Weather	01	02	03	04	05
Land Fallowing Program	01	02	03	04	05
Gov't Commodity Program	01	02	03	04	05
Consolidation of business operation	01	02	03	04	05
Change in business competition	01	02	03	04	05
Prison expansion	01	02	03	04	05
Housing construction	01	02	03	04	05
Other_____	01	02	03	04	05

12. Please indicate what you expect the impact of the following factors will be on your revenues in 1994:

	(Circle One for each factor)				
	Significant Decrease	Minor Decrease	No Impact	Minor Increase	Significant Increase
Prices/availability of goods/services you sell	01	02	03	04	05
Prices/availability of goods/services you buy	01	02	03	04	05
Statewide recession	01	02	03	04	05
Weather	01	02	03	04	05
Land Fallowing Program	01	02	03	04	05
Gov't Commodity Program	01	02	03	04	05
Consolidation of business operation	01	02	03	04	05
Change in business competition	01	02	03	04	05
Prison expansion	01	02	03	04	05
Housing construction	01	02	03	04	05
Other_____	01	02	03	04	05

13. If this business sold products/services to farms, approximately what percent of total revenues did these sales account for?

	(Circle One)
Less than 10%	01
10% to 19%	02
20% to 49%	03
50% to 75%	04
More than 75%	05

ABOUT THIS BUSINESS' EMPLOYEES

14. Approximately how many full-time employees (including yourself) were employed by this business in 1992, 1993, and 1994? (By full-time we mean people who worked 40 or more hours per week for nine or more months per year.)

1992 Full-time Employees	_____
1993 Full-time Employees	_____
1994 Full-time Employees	_____

15. Did you employ more, less, or the same number of full-time employees in 1993 as in 1992?

	(Circle one)
More	01
Less	02
Same	03

16. What do you believe to be the primary reason for the change in employment between 1992 and 1993 you indicated above?

_____
_____
_____
_____

17. Will you employ more, less, or the same number of full-time employees in 1994 as in 1993?

	(Circle one)
More	01
Less	02
Same	03

18. What do you believe to be the primary reason for the expected change in employment between 1993 and 1994 you indicated above?

_____
_____
_____
_____

20. Approximately how many part-time/seasonal employees were employed by this business in 1992, 1993, and 1994? (By part-time/seasonal we mean people who work less than 40 hours per week or less than nine months per year.)

1992 Part-time/Seasonal Employees	_____
1993 Part-time/Seasonal Employees	_____
1994 Part-time/Seasonal Employees	_____

21. Did you employ more, less, or the same number of part-time/seasonal employees in 1993 as in 1992?

	(Circle one)
More	01
Less	02
Same	03

22. What do you believe to be the primary reason for the change in employment between 1992 and 1993 you indicated above?

_____
_____
_____
_____

23. Will you employ more, less, or the same number of part-time/seasonal employees in 1994 as in 1993?

	(Circle one)
More	01
Less	02
Same	03

24. What do you believe to be the primary reason for the expected change in employment between 1993 and 1994 you indicated above?

_____
_____
_____
_____

ABOUT THE LAND FALLOWING PROGRAM

25. We'd like to know if you think the Land Fallowing Program had any effect on the local economy. If there were any positive or negative effects, please briefly describe. (Attach additional pages as necessary.)

_____

_____

_____

_____

26. Do you know of any businesses in the area that you think were negatively affected by the Land Fallowing Program? If yes, please list their names and addresses:

Name: _____ Name: _____
Address: _____ Address: _____
_____ _____

Name: _____ Name: _____
Address: _____ Address: _____
_____ _____

27. Do you know of any businesses in the area that you think were positively affected by the Land Fallowing Program? If yes, please list their names and addresses:

Name: _____ Name: _____
Address: _____ Address: _____
_____ _____

Name: _____ Name: _____
Address: _____ Address: _____
_____ _____

28. Do you know of any Community Organizations in the area that you think were positively or negatively affected by the Land Fallowing Program? If yes, please list their names and addresses. (By community organizations we mean government social service agencies, churches, charities, and volunteer organizations.)

Name: _____ Name: _____
Address: _____ Address: _____
_____ _____

Positively affected ____ Positively affected ____
Negatively affected ____ Negatively affected ____

29. Do you have suggestions for how the Land Fallowing Program might have been managed differently? (Attach additional pages as necessary.)

30. What do you think could have been done to increase the positive effects or lessen the negative effects of the Land Fallowing Program? (Attach additional pages as necessary.)

Please indicate if you would like to receive a copy of the study results.

Yes ____
No ____

THANK YOU FOR COMPLETING THE SURVEY

Questions about this survey?
Call David Mitchell: 510/547-6369

APPENDIX B

CROP BUDGET ANALYSIS

Table B1
Crop: Sudangrass

Estimated Acreage Displaced by Program	2,413
Estimated Reduction in Gross Revenue	1,628,775

Purchased inputs 1/

Labor

Task	Quantity	Units	Unit Cost	Expenditures per acre	Expenditures reduced by fallowed acreage 2/
Irrigate	4	hrs	5.75	23.00	55,499.00
		Total purchased labor		$23.00	$55,499.00

Materials

Type	Quantity	Units	Unit Cost	Expenditures per acre	Expenditures reduced by fallowed acreage
Seed	85	lbs.	0.6	51.00	123,063.00
NH3 fert.	200	lbs.	0.15	30.00	72,390.00
Fuel and Oil					27,689.18
Repair and Maintenance					40,719.38
		Total purchased materials			$263,861.55

Custom Hire

Type	Quantity	Units	Unit Cost	Expenditures per acre	Expenditures reduced by fallowed acreage
Seed				8.50	20,510.50
Fertilize				10.50	25,336.50
		Total custom hire		$19.00	$45,847.00

Notes:
1/ Production cost estimates from UC Cooperative Extension Imperial County Crop Budget for Sudangrass Hay, 1991-92.
2/ Estimates do not account for more intensive use of inputs on remaining cultivated acreage. Labor and material usage and cost for actual operations within PVID may differ from those reported here.

Table B2
Crop: Wheat

Estimated Acreage Displaced by Program	1,520
Estimated Reduction in Gross Revenue	565,440

Purchased inputs 1/

Labor

Task	Quantity	Units	Unit Cost	Expenditures per acre	Expenditures reduced by fallowed acreage 2/
all tasks	1.8	hrs	5.75	10.35	15,732.00
		Total purchased labor		$10.35	$15,732.00

Materials

Type	Quantity	Units	Unit Cost	Expenditures per acre	Expenditures reduced by fallowed acreage
Seed				19.50	29,640.00
Fert.				45.90	69,768.00
Pest.				4.08	6,201.60
Herb.				2.66	4,043.20
Fuel and Oil					9,612.48
Repair and Maintenance					14,136.00
		Total purchased materials			$133,401.28

Custom Hire

Type	Quantity	Units	Unit Cost	Expenditures per acre	Expenditures reduced by fallowed acreage
Pre plant fert				5.16	7,843.20
Fertilize				5.16	7,843.20
Insecticide				5.00	7,600.00
Herbicide				5.00	7,600.00
		Total custom hire		$10.32	$30,886.40

Notes:
1/ Production cost estimates from UC Cooperative Extension San Joaquin Valley Crop Budget for Double Cropped Wheat, 1990.
2/ Estimates do not account for more intensive use of inputs on remaining cultivated acreage. Labor and material usage and cost for actual operations within PVID may differ from those reported here.

Table B3
Crop: Alfalfa

Estimated Acreage Displaced by Program	16,282
Estimated Reduction in Gross Revenue	14,653,800

Purchased inputs 1/

Labor

Task	Quantity	Units	Unit Cost	Expenditures per acre 2/	Expenditures reduced by fallowed acreage 3/
Irrigate to establish	2	hrs	5.75	3.83	62,414.33
Irrigate	9	hrs	5.75	51.75	842,593.50
		Total purchased labor		$51.75	$905,007.83

Materials

Type	Quantity	Units	Unit Cost	Expenditures per acre	Expenditures reduced by fallowed acreage
Fert to establish	260	lbs.	0.15	13.00	211,666.00
P205 fert.	90	lbs.	0.12	10.80	175,845.60
Seed to establish	20	lbs.	1.45	9.67	157,392.67
Insect. to establish				2.33	37,991.33
Insect.				46.00	748,972.00
Herb. to establish				4.33	70,555.33
Herb.				24.00	390,768.00
Fuel and Oil					249,114.60
Repair and Maintenance					366,345.00
		Total purchased materials		$97.13	$2,408,650.53

Custom Hire

Type	Quantity	Units	Unit Cost	Expenditures per acre	Expenditures reduced by fallowed acreage
Pre plant fert				2.67	43,418.67
Seed to Establish				3.50	56,987.00
Insect. to Establish				1.63	26,593.93
Insect.				19.60	319,127.20
Herb. to Establish				2.92	47,489.17
Herb.				4.90	79,781.80
		Total custom hire		$6.17	$573,397.77

Notes:
1/ Production cost estimates from UC Cooperative Extension Imperial County Crop Budget for Alfalfa, 1991-92.
2/ Per acre expenditures for establishment costs divided by 1/3 to reflect 3-year field life.
3/ Estimates do not account for more intensive use of inputs on remaining cultivated acreage. Labor and material usage and cost for actual operations within PVID may differ from those reported here.

Table B4
Crop: Lettuce

Estimated Reduction in Acreage: 1988-91	15,035
Estimated Reduction in Gross Revenue	35,708,125

Purchased inputs 1/
Labor

Task	Quantity	Units	Unit Cost	Expenditures per acre	Reduction in expenditures due to decreased production 2/
Irrigate	8	hrs	5.75	46.00	691,610.00
Weed	12	hrs	5.75	69.00	1,037,415.00
Thin	17	hrs	5.75	97.75	1,469,671.25
		Total purchased labor		$46.00	$3,198,696.25

Materials

Type	Quantity	Units	Unit Cost	Expenditures per acre	Reduction in expenditures due to decreased production 2/
Seed				92.00	1,383,220.00
11-52-0 fert	500	lbs.	0.14	67.75	1,018,621.25
N fert	180	lbs.	0.31	55.80	838,953.00
Insecticide				113.00	1,698,955.00
Herbicide				11.40	171,399.00
Fuel and Oil					0.00
Repair and Maintenance					0.00
		Total purchased materials			$5,111,148.25

Custom Hire

Type	Quantity	Units	Unit Cost	Expenditures per acre	Reduction in expenditures due to decreased production 2/
Seed				15.25	229,283.75
Insect Control				45.00	676,575.00
Weed Control				17.00	255,595.00
Fertilize				27.00	405,945.00
Cut and Pack				1,280.00	19,244,800.00
		Total custom hire		$1,384.25	$20,812,198.75

Notes:
1/ Production cost estimates from UC Cooperative Extension Imperial County Crop Budget for Iceburg Lettuce, 1992-93.
2/ The data in this table reflect the decrease in lettuce production that has occured between 1988 and 1991, and are for comparison purposes only. This study found no relationship between the fallowing program and changes in lettuce acreage.

SDR CHAMBER OF COMMERCE

SAN DIEGO REGIONAL CHAMBER OF COMMERCE

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April 26, 2002

Mr. Bruce D. Ellis
U.S. Bureau of Reclamation
Phoenix Area Office
PO Box 81169
Phoenix, AZ 85069-1169

Mr. Elston Grubaugh
Manager, Resources, Mgmt., & Planning
Imperial Irrigation District
PO Box 937
Imperial, CA 92251

Dear Mr. Ellis and Mr. Grubaugh:

On behalf of the San Diego Regional Chamber of Commerce, I would like to take the opportunity to comment on the draft EIR/EIS for the Imperial Irrigation District (IID) – San Diego County Water Authority water transfer project.

The Chamber has been a long-time supporter of the unprecedented IID-San Diego water transfer. This transfer will replace the water that we will lose as a result of California's mandate to reduce its use of Colorado River water to 4.4 million acre feet. According to the Secretary of the Interior, California must implement this mandate, the Quantification Settlement Agreement, by the end of this year or risk the immediate loss of 700,000 acre feet on January 1, 2003. Such a loss would have an enormous detrimental effect on all of California, and especially the San Diego region, which is almost exclusively dependent on imported water, the vast majority of which comes from the Colorado River.

R2-1

The transfer provides much-needed diversification of the San Diego County Water Authority's supply, in addition to serving as replacement water. The Authority is aggressively pursuing other sources such as seawater desalination, additional conservation measures and recycling, but these will not be adequate to replace what we will eventually lose from the Colorado River water entitlement.

The Chamber believes it is critical to the San Diego region, and to all of California, that the Imperial Irrigation District transfer comes to fruition this year. Our economy and livelihood depend on it.

Sincerely,

Jessie J. Knight, Jr.
President & CEO

JJK:av

Letter - R2. San Diego Regional Chamber of Commerce. Signatory - Jessie J. Knight, Jr..

Response to Comment R2-1

Comment noted.

MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

RECEIVED MAY 2 2002

April 26, 2002

Mr. Bruce D. Ellis
U.S. Bureau of Reclamation
Phoenix Area Office (PXAO-1500)
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Phoenix, AZ 85069-1169

Mr. Elston Grubaugh
Manager of Resources,
Management, and Planning Department
Imperial Irrigation District
P.O. Box 937
Imperial, CA 92251

Gentlemen:

January 2002 Draft Environmental Impact Report/Environmental Impact Statement for the Imperial Irrigation District Water Conservation and Transfer Project and Draft Habitat Conservation Plan

R3-1 The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to review the Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) for the Imperial Irrigation District (IID) Water Conservation and Transfer Project (Project) and Draft Habitat Conservation Plan (HCP). Metropolitan is submitting comments as a potentially affected public agency.

Metropolitan strongly supports efforts to facilitate long-term shifts of water made available voluntarily from agriculture to beneficial urban uses. Metropolitan in conjunction with the IID, Coachella Valley Water District (CVWD), and the San Diego County Water Authority (SDCWA) are undertaking cooperative efforts to reduce the State of California's consumption of Colorado River Water to its annual apportionment under the proposed Quantification Settlement Agreement (QSA) and California's Colorado River Water Use Plan. The IID Water Conservation and Transfer Project is an important part of California's effort to reduce its current use of approximately 5.2 million acre-feet of Colorado River water to the 4.4 million acre-foot normal year levels.

Colorado River Water Rights

R3-2 In the description of the proposed project, there is a discussion indicating that the IID-SDCWA transfer could proceed in the absence of the execution of the QSA. The QSA provides the

Letter - R3. Metropolitan Water District of Southern California. Signatory - Laura J. Simonek.

Response to Comment R3-1

Comment noted.

Response to Comment R3-2

IID does not agree that in the absence of the QSA, IID and SDCWA must receive approval of CVWD and MWD before a transfer from IID to SDCWA could occur. This difference of opinion does not impact the environmental analysis. Any legal objections to such a transfer can be resolved by agreement or in the appropriate forum. As noted in the Draft EIR/EIS, IID and SDCWA have filed a petition seeking SWRCB approval of the water transfers, including a determination that the Project is in furtherance of SWRCB Decision 1600, SWRCB Order WR 8820, Article X, Section 2 of the California Constitution, and Sections 100 and 109 of the Water Code. Reclamation's agreement to implement the change in diversion required for a transfer to SDCWA, in a form similar to the IA anticipated for the QSA, would also be needed.

R3-2

R3-3

institutional and legal framework that would allow the parties to implement the various water transfers, conservation projects and storage programs that constitute California's Colorado River Water Use Plan (California Plan). The use, allocation and movement of Colorado River water is governed by federal law known as The Law of the River, which includes statutes, acts of Congress, an inter-state compact, United States Supreme Court decrees, and an international treaty. The allocation of Colorado River water among California water agencies is specifically governed by the water rights priority system established by the 1931 Seven Party Agreement. The Seven Party Agreement established a priority system in which water unused in one priority becomes available for use by the next priority. Under this cascading priority system, water transferred by IID to the SDCWA must flow through the priorities of the CVWD and Metropolitan. Accordingly, the proposed transfer must have the permission of both CVWD and Metropolitan for the water to reach the SDCWA. The QSA, among a number of other things, would provide the approval of both CVWD and Metropolitan to the IID-SDCWA transfer. In the absence of the QSA, the transfer parties must seek and receive approval of CVWD and Metropolitan before the transfer can occur and the environmental documentation should reflect that fact.

Water Conservation Strategies

R3-4

The Draft EIR/EIS evaluates two primary methods for conservation water – (i) on-farm and distribution systems conservation methods and (ii) fallowing. Metropolitan concurs with the conclusion of the Draft EIR/EIS that implementation of a fallowing conservation strategy would significantly reduce potential environmental effects. As outlined in the Draft EIR/EIS, fallowing is evaluated as a method to provide conserved water to meet the water transfer goals of the Project and to minimize or offset the temporal impacts of increased salinity of the Salton Sea.

Water made available to offset impacts to the Salton Sea could be made available through transitional evapotranspiration land fallowing and would include voluntary fallowing of land for an interim period, such that the Project would have no effect on Salton Sea inflows and salinity for the transition period. This could be accomplished by initially making available for transfer or acquisition, the amount of water that would have been lost to on-farm evapotranspiration while permitting the remaining amount to be used for farmland management and maintenance before being discharged to agricultural drains, the New or Alamo rivers, or the Salton Sea. The water used for farmland management and maintenance would be an application of water to a recognized contract purpose within an existing contract service area. The receipt of such water in the agricultural drains, the New or Alamo rivers, and the Salton Sea would be incidental to contract water use purposes. It should be noted that while the Salton Sea receives drainage from Coachella Valley, Imperial Valley, and Mexicali Valley occurring as the result of the use of Colorado River Water in those valleys, the Salton Sea has no Colorado River water right nor a Colorado River water contract for the use of Colorado River as required under The Law of the

Response to Comment R3-3

See response to comment R3-2.

Response to Comment R3-4

IID maintains that because conservation of water is a valid agricultural use, any mitigation required for creating the conserved water is also a valid agricultural use. One way to mitigate for reduction in drainage inflow to the Salton Sea is to fallow certain agricultural fields and provide the water that would otherwise be used on those fields to the Salton Sea. The ancillary use of water for required mitigation necessary to utilize an allowed agricultural use is itself an agricultural use. Thus, the fallowing is a valid beneficial agricultural use. The comment uses the term "transitional evapotranspiration land fallowing", a term that has no commonly understood meaning in the context of the creation of conserved water. "Transition" is defined in Merriam Webster's Collegiate Dictionary as "1. a passage from one state, stage, subject, or place to another; 2. a movement, development, or evolution from one form, stage, or style to another…" The comment suggests that water be run through a field that is not under cultivation and then released into the drains which in turn lead to the Salton Sea. All this would accomplish is a significant loss of water because of evaporation.

River. Once the transition period has ended, transitional land fallowing could be replaced by either on-farm/distribution system conservation or voluntary direct fallowing wherein all water that otherwise would have been applied to the land is transferred. R3-4

Economic Analysis of the Proposed Program

Metropolitan acknowledges that while a fallowing conservation strategy would reduce the potential environmental effects of the proposed transfer, additional socioeconomic or third party impacts may result. In evaluating socioeconomic effects of fallowing, the Draft EIR/EIS states the historical crop pattern was used because the actual future participants in a voluntary fallowing program cannot be identified in advance with certainty, and IID believes it is reasonable to assume that the program will involve a range of crops through the IID Water Service Area. The Draft EIR/EIS acknowledges that if the actual mix of fallowed lands includes a higher percentage of less valuable crops, the impacts could be less than what are reported. This conclusion has been verified by two additional studies that have been prepared that evaluated the economic effects associated with fallowing in the IID Water Service Area.[1] Thus, it appears that a fallowing program could be crafted to minimize the socioeconomic effects by limiting participation to low value crops or lands having low productivity. Such a focused fallowing program should be included in the Final EIR/EIS and the results of these studies factored into any decision on the proposed program. R3-5

Overstated Effects

In reviewing the Draft EIR/EIS, it appears that the Draft EIR/EIS in presenting a "worst case" assessment has resulted in an overly conservative estimate of potential effects in a number of resource areas. This overstatement of effects can be seen in the analysis of potential socioeconomic effects, in the estimates of inflows to the Salton Sea and in the estimated increased selenium concentrations on aquatic resources. A wide range of information on the effects should be included in the Final EIR/EIS. Metropolitan encourages the development of adaptive management techniques in order to adjust mitigation plans adopted for the proposed Project as necessary to reflect actual impacts as they become known. R3-6

Effects on the Salton Sea

Measures proposed in the Draft EIR/EIS to mitigate impacts to Salton Sea aquatic resources are based on the difference in years at which Salton Sea salinity reaches 60,000 mg/L compared to the baseline. These respective differences are shown in Figure 3.1-29 of the Draft EIR/EIS. The R3-7

[1] These studies are: *Economic Impacts of Fallowing Irrigated Land in the Imperial Irrigation District*, prepared by the U.S. Bureau of Reclamation, and *Independent Analysis of the Economic Impact Studies in the IID Water Conservation and Transfer Project EIR/EIS*, prepared by CIC Research.

Response to Comment R3-5

Refer to the Master Response on *Socioeconomics—Crop Type Assumptions for Socioeconomic Analysis of Fallowing* in Section 9 of this Final EIR/EIS.

Response to Comment R3-6

Refer to the Master Responses on *Socioeconomics—Crop Type Assumptions for Socioeconomic Analysis of Fallowing, Hydrology—Development of the Baseline* and *Hydrology—Selenium Mitigation* in Section 9 of this Final EIR/EIS.

Response to Comment R3-7

Please refer to the Master Responses on *Hydrology—Development of the Baseline and Biology—Approach to Salton Sea Habitat Conservation Strategy* in Section 9 in this Final EIR/EIS.